



COLORADO
Department of Public
Health & Environment

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Electronic submittal

March 30, 2016

Mr. Anthony Brown
Atlantic Richfield Company
4 Centerpointe Drive 4-435
La Palma, CA 90623

RE: Construction Completion Report 2014-2015
Determination: Approved
Rico-Argentine Solids Repository (Phase 1) in Dolores County, Colorado
SW / DOL ARC / 2.3

Dear Mr. Brown:

The Hazardous Materials and Waste Management Division of the Colorado Department of Public Health and Environment (Division) received the following report:

- “*Construction Completion Report - 2015*” for the Rico-Argentine Solids Repository Phase 1 dated October 2015, submitted by Atlantic Richfield Company and prepared by AECOM (Report).

The facility is under construction consistent with the Rico-Argentine Solids Repository Engineering Design and Operations Plan pertaining to the Rico-Argentine Mine Site - Rico Tunnels Operable Unit OU-01 (OU-01) dated October 2014 (EDOP). The owner/operator is Atlantic Richfield Company. The EDOP was prepared pursuant to the Environmental Protection Agency Unilateral Administrative Order for Removal Action (UAO, CERCLA Docket No. 08 2011-0005). The Report presents construction activities completed 2014 -2015 for Phase 1 of the repository, which represents a majority of the entire construction project. The remaining activities and documentation are scheduled for 2016.

The Report was reviewed to evaluate compliance with the Solid Wastes Disposal Sites and Facilities Act, CRS 30-20-100.5 *et. seq.* (“the Act”), the Regulations Pertaining to Solid Waste Sites and Facilities, 6 CCR 1007-2, Part 1 (“the Regulations”) and the approved EDOP. The Division has determined that Phase 1 Construction Completion Report for 2014-2015 is approved.

The Division understands that Atlantic Richfield is interested in placing waste into the cell soon after placing the filter sand portion of the leachate drain. Financial assurance mechanism has been approved and funded. The Division approves the placement of waste into the cell prior to finalizing construction documentation for 2016 activities and prior to Division approval of that documentation. The Certifying Professional Engineer (for the construction) should provide written notice to the Division, Dolores County and Atlantic Richfield that the filter sand has been placed in accordance with the EDOP and that a specific area of the cell is ready to accept waste. In the notification please include a description of the area for waste disposal and the separation that will be maintained between waste and the edge of leachate drain material either on the cell side slopes or where the filter sand material has not been placed.

The Division provides the following comments to consider when preparing the construction completion report for 2016.

1. Information to be provided should document the thickness of the leachate drainage layer(s).



2. Include the construction observations associated with the surface water controls to verify they were constructed in accordance with the design.
3. Include any field daily reports not provided in this Report (April 27 through May 10, 2015).
4. Photographs or field daily reports pertaining to installation of the leachate pipe boot through the HDPE liner.

In closing, the Division is authorized to bill for the review of technical submittals pursuant to C.R.S. 30-20-109 (2) (b) at the rate of \$125 per hour. An invoice for the Division review of the report will be transmitted to you under separate cover.

Sincerely,



Robert J. Peterson
Environmental Protection Specialist
Solid Waste Permitting Unit
Hazardous Materials and Waste Management Division

cc: GJ file
ec: D. Yadon, AECOM
M. Daves, Dolores County
E. Williams, Dolores County BOCC